



April 20, 2018

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, D.C. 20554

RE: **Ex parte** filing in WC Docket Nos. 16-271 and 18-89

Dear Ms. Dortch:

On April 18, James Dunn, CEO of Copper Valley Telecom, Copper Valley Board President Michael Rego, and the undersigned from GVNW Consulting, Inc. (GVNW) conducted separate *ex parte* meetings with Amy Bender from Commissioner O'Rielly's office and Jamie Susskind from Commissioner Carr's office. On the same day, we also met with Chief of Staff Travis Litman from Commissioner Rosenworcel's office.

The *ex parte* meetings included a discussion of Copper Valley's excellent progress on its performance obligations for the first five quarters of the Alaska Plan, highlighted by the installation of 150 miles of fiber. We also requested that the Commission encourage USAC to open the Alaska Plan middle mile mapping portal immediately so that Copper Valley and other Alaska carriers have time to meet the compliance requirements of July 1, 2018, for that module.

Maintaining adequate federal universal service funding (FUSF) is required for implementation of all of the Commission's universal service initiatives, including the Alaska Plan. In this regard, we expressed support for maintaining at least the overall high-cost funding budget level of \$4.5 billion, pending further study.

We also discussed the Commission's docket (WC Docket No. 18-89) designed to examine protecting against national security threats to the communications supply chain through FCC programs. We sought clarification as to the specifics of the methods by which the Commission would prospectively prohibit federal USF support from being used to purchase equipment from certain Chinese vendors. Copper Valley Wireless (CVW) is currently includes equipment from vendor ZTE as a part of its wireless rate base. CVW's current plans are to migrate away from reliance on ZTE by the end of 2018 or early 2019, subject to securing certain arrangements with other third parties.

We also discussed the proper metric for broadband target speeds in the country, including for carriers facing the unique challenges posed by the circumstances in Alaska. We shared the recent achievement of 1 Gig speeds in the city of Valdez.

As required by the Commission's rules, this *ex parte* record is now filed in the above referenced dockets. If there are any questions, please call me on 503.612.4409.

Respectfully submitted,

Via ECFS 4/20/18

Jeffrey H. Smith  
President and CEO

Copy to

Amy Bender, FCC  
Jamie Susskind, FCC  
Travis Litman, FCC  
James Dunn  
Michael Rego